

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**DECLARATION OF
KATHLEEN E. CASSIDY**

KATHLEEN E. CASSIDY, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the Bar of this Court and am a partner at Hafetz & Necheles LLP, attorneys for Defendant Clare Bronfman. I am submitting this declaration in support of Defendants Clare Bronfman, Kathy Russell, and Nancy Salzman's Motion to Sever, dated January 9, 2019.

2. Included in discovery provided as Rule 16 material to defendants in this case were documents labeled VDM_NXIVM00002811-2814, which depict women taking photos of themselves in certain poses. These photos were labeled "Collateral" by the government in the discovery letter accompanying the photos, and were designated "Victim Discovery Material" subject to the Protective Order governing discovery in this case.

3. Attached as Exhibit A is a true and correct copy of the documents produced to defendants as VDM_NXIVM00002811-2814, with the exception that the documents were produced to defendants in unredacted form. My firm applied the redactions to the photos before attaching them as an exhibit to this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2019
New York, New York



KATHLEEN E. CASSIDY